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To: Dabbs, Paul

Subject: Bulletin 160-05

Below are comments developed regarding Bulletin 160-05 (Plan) from the FRIANT WATER AUTHORITY.

Fundamental Concerns:

Purpose of the Plan stated as, "California needs a sustainable and reliable water supply" and to ensure that, the plan created three foundational objectives: Water Efficiency, Protect Water Quality and Support Environmental Stewardship.

1. In our opinion, these are not foundations. There are laws already established for directing this aspect of water management. Given that the scope (defined in the purpose of the plan) of the report should be as stated. However the foundation should focus on protecting water rights, protecting and enhancing water supplies to meet the needs of the growing population and demands, compliance with state and federal water laws. These are foundations. Whereas, we believe the current are values. As you know values are determined by the population either through legislatures or referendums/propositions. We believe the document should focus strictly on needs not on values.

2. The Plan focuses only marginal attention to address the fact that the State has done little to our state water infrastructure, aside from environmental enhancement or mitigation, since the mid 1970's. However, by 2030 there will be 25 million more people living in the State of California since then (nearly a 100% increase). In essence the Plan makes the assertion, as described in the foundational objective of Water Efficiency, that conservation, regional management and groundwater recharge will be the main focus of meeting the water needs for the next 25 years, while the other foundations add nothing to reliability or sustainability. However, we have suffered an infrastructure drought since the 1970's and grown by 13 million people. To further drive that impact, landowners and water users have given up several hundred thousand acre feet of water to meet environmental needs, small farms are forced out of production due to increased water costs as the fight for water turns to dollars, groundwater has been severely impacted, and much more. Given these impacts, it is a real concern for us that the State continues to offer little or no support for infrastructure to store and convey water. Leadership to build more storage facilities is where this document needs to go. We simply will not make up the needs of the state by deferring to conservation. Recommendation four needs to be explicit that building infrastructure is crucial to meet water demands. Instead Recommendation 4 focuses on maintenance of aging infrastructure.

Technical Concerns:

1. New Melones being the most recent substantive dam (completed in 1979), since that time California's population has grown from 13 million people from 24 million in 1980 to 37 million in 2003 (DOF report released May 2, 2005). No new substantive infrastructure has been developed and as noted above other issues have impacted water users. However in the water demand analysis rural Tulare Lake region in all three scenarios the plan forecasts substantial reduction in water demand, most are marginal increases/decreases while Sacramento and the South Coast will see potentially substantial increases in their demand. If this is the case, certainly infrastructure to move the water either through increased pumping at Banks or other will be required.

2. The Plan used a very limited number of years for which to base its analysis on demands. We were told at the Fresno public workshop that the legislation prior to 1993 skewed the analysis. Particularly, nearly 1.5 million acre feet moved from water users to the environment from CVPIA. However, there were huge impacts to water users, groundwater, farming, etc. as a result of legislation (both federal and state) prior to 1993. It seems that when using historical information to establish future projections, sound analysis should command a larger sample set. Convenience in the analysis only weakens the results.

3. What is the basis of the environmental water assumptions in Table 4-4 (Page 4-14)? Specifically, where does the document get 344 TAF for Trinity and 268 TAF for San Joaquin River? The sources should be referenced. Our understanding is that an environmental group study is where the 344 TAF for Trinity was developed yet there is no reference to that. This reference in our opinion drives suspicion and then add to it that it was used but not referenced generate a host of concerns by water users in our area. We believe the demand is greater for Trinity. Additionally, Friant Water User Authority's own numbers show significant impacts to water supply if required to create an anadromous fishery between Friant Dam and the Merced River. This would severely impact the analysis. 268 TAF from Millerton doesn't even touch the potential impact.

4. Given the variance of the demands as dictated in the analysis of water demands, the summary (pg 4-30) clearly should indicate enhanced water supply/storage/conveyance systems greatly improves the ability for the State to balance its demands with the environmental needs and drought planning.

5. Recommendation format is good. However, the recommendations do not go far enough in meeting the demands for water. Again the focus is value oriented not substantive in meeting a demand portfolio. We recommend that the Plan lay out more calculable performance measures. One suggestion would be to show how the implementation will increase supply, how much new supply is created and in the case of conservation how much is expected to be saved. In the case of Recommendation 2, what will be the benefit of supporting CALFED, what will be the benefit of integrated management plans, define "progress" in meeting actions developed MOU's.

6. The ACWA Blueprint was developed by a coalition of public water agencies and should be given considerable attention in the recommendations.

Finally, the workshops seemed like school and not a public review process. It offered a way to formulate questions, however, groups may not have been cohesive and answers or potential responses were limited. There was no indication of feedback unless there was going to be enough time for DWR staff to answer them. Generally the questions were not answered and thus feedback that could've been reported by public newspapers etc. was limited. Some questions were important to many stakeholders yet were not responded to because of a lack of time. In our opinion DWR tried something new that was not effective in answering our questions.

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